

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., individually, and)	
on behalf of a Class of persons)	
similarly situated,)	
<i>Plaintiff</i> , and)	
)	
CITY OF SUMMERVILLE, GA,)	
<i>Intervenor-Plaintiff</i> ,)	Civil Action No.
)	4:21-cv-40-TWT
vs.)	
)	
3M COMPANY, et al.,)	
<i>Defendants</i> .)	

**CONSENT MOTION FOR EXTENSION OF TIME FOR
HUNTSMAN INTERNATIONAL LLC TO RESPOND TO DISCOVERY**

Pursuant to Local Rule 7.4 and consistent with the Federal Rules of Civil Procedure 26, 29, 33, and 34, Defendant Huntsman International, LLC (“Huntsman”) moves the Court to approve a 30-day extension of time for Huntsman to respond to Plaintiff Earl Parris, Jr.’s First Interrogatories and Requests for Production of Documents (“Discovery Requests”). In support of this Motion, Huntsman states as follows:

1. The Discovery Requests were served on June 6, 2022, and Huntsman’s responses would be due on July 6, 2022.
2. Huntsman seeks an additional 30 days to gather information

necessary to prepare its responses to the Discovery Requests, and upon approval of the Court, Huntsman's discovery responses would be due on August 5, 2022.

3. Counsel for Plaintiff Parris have expressly agreed to Huntsman's request for the above-referenced, 30-day extension of time for the company to respond to the Discovery Requests.
4. No pending deadline of the Court's Scheduling Order [Dkt. 187] will be affected by approving the requested extension.

A proposed Order Granting this Consent Motion for Extension of Time for Huntsman International LLC to Respond to Discovery is submitted with this motion for the Court's consideration.

Respectfully submitted, this 30th day of June, 2022.

/s/ Benjamin E. Fox
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*Attorney for Defendant Huntsman
International LLC*

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the within and foregoing **CONSENT MOTION FOR EXTENSION OF TIME FOR HUNTSMAN INTERNATIONAL LLC TO RESPOND TO DISCOVERY**, which has been prepared using 14-point Times New Roman font, with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 30th day of June, 2022

/s/ Benjamin E. Fox

Benjamin E. Fox,
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*Attorney for Defendant Huntsman
International LLC*